

IN THE UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF GEORGIA

ATLANTA DIVISION

NATALIE SOTO,

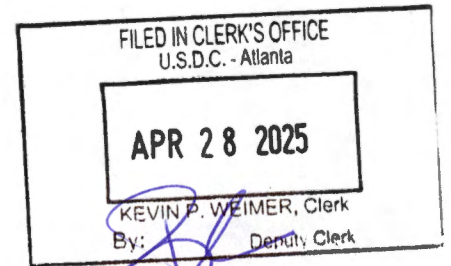
Plaintiff,

v.

WENDELL HOLMES, JR.,

Defendant.

Civil Action No. 1:24-cv-02911-SDG.



**DEFENDANT'S DECLARATION IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT**

I, Wendell Holmes, Jr., declare under penalty of perjury that the following statements are true and correct to the best of my knowledge, information, and belief:

1. My name is Wendell Holmes, Jr., and I am the Defendant in the above-captioned case. I make this Declaration based on my personal knowledge.
2. I did not unlawfully or intentionally distribute any intimate images of Plaintiff with the purpose of harassment, intimidation, or harm.
3. After months of no communication between Plaintiff and me, Plaintiff contacted me demanding money for a veterinary surgery and threatening to contact my wife if I did not comply.
4. When I refused Plaintiff's monetary demands, she began contacting members of my family, including my wife and sister-in-law, and threatened to publicly expose me.
5. Plaintiff also posted derogatory information about me on social media, falsely portraying me in a negative light to the public.
6. Plaintiff's online postings and contacts with my family caused significant emotional distress, reputational harm, and disruption to my personal and professional life.

7. Plaintiff contacted my employer, Pleasant Grove Missionary Baptist Church, and as a result of her actions, I was arrested during a church service on June 16, 2024, and subsequently terminated from my employment. As a direct consequence of Plaintiff's actions, I suffered reputational harm, lost my primary source of income, and experienced significant emotional distress.
8. Prior to my termination, I earned \$400 per Sunday service, totaling approximately \$1,600 per month, with additional income from extra services, teaching, studio recording, and musical gigs, often paid in cash.
9. The public nature of my arrest, combined with Plaintiff's online conduct, made it extremely difficult for me to secure future employment opportunities as a self-employed musician, including church work, private events, studio recording, and teaching opportunities.
10. I respectfully submit this Declaration in support of my Motion for Summary Judgment and in opposition to Plaintiff's claims.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 28th day of April, 2025.



Wendell Holmes, Jr., Pro Se

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Mableton, GA 30126

[wendellholmesjr@gmail.com](mailto:wendellholmesjr@gmail.com)

### **CERTIFICATE OF SERVICE**

I certify that on April 28, 2025, I filed this Response via email, which will serve:

Joseph W. Weeks

McNALLY WEEKS

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